

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MATTER OF

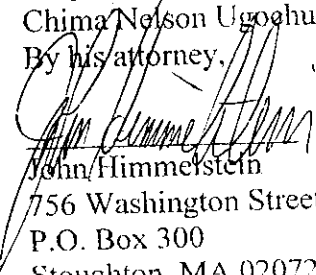
CHIMA NELSON UGOCHUKWU

PETITIONER'S MOTION FOR HABEAS CORPUS AND TO STAY DEPORTATION
PROCEEDINGS PURSUANT TO 8 U.S.C. SECTION 2241

Now comes the petitioner, Chima Nelson Ugochukwu, and asks a hearing, a stay of deportation and an ultimate dismissal of all I.N.S. proceedings based on the following:

- (1) This Honorable Court has jurisdiction over this matter pursuant to 8 U.S.C. Section 2241 and this motion/petition is filed in a timely fashion;
- (2) The petitioner is 30 years old and married to a United States citizen;
- (3) The petitioner resides in Lynn, Massachusetts;
- (4) He fled his home country of Nigeria due to political persecution of both him and his family, sad persecution described specifically and graphically in the attached copy of the Motion to Re-Open, which was filed with the Board of Immigration Appeals;
- (5) Due to the political situation in Nigeria, he was unable to procure the proper immigration documents and arrived in Los Angeles illegally in the year 2000;
- (6) The petitioner currently has a pending green card petition;
- (7) We assert that the lower courts erred in not granting political asylum to the petitioner.

Respectfully submitted,
Chima Nelson Ugochukwu,
By his attorney,



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